

AMY JOSEPH PEDERSEN, OSB No. 853958
amy.joseph.pedersen@stoel.com
STOEL RIVES LLP
760 SW Ninth Avenue, Suite 300
Portland, OR 97205
Telephone: (503) 224-3380
Facsimile: (503) 220-2480

DANIEL PRINCE, Cal. SB# 237112 (*pro hac vice*)
danielprince@paulhastings.com
FELICIA A. DAVIS, Cal. SB# 266523 (*pro hac vice*)
feliciadavis@paulhastings.com
LAURA E. ZABELE, Cal. SB# 330847 (*pro hac vice*)
laurazabele@paulhastings.com
PAUL HASTINGS LLP
515 South Flower Street, 25th Floor
Los Angeles, CA 90071
Telephone: (213) 683-6000
Facsimile: (213) 627-0705

Attorneys for Defendant NIKE, INC.
[Additional counsel of record listed on signature page]

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, SARA JOHNSTON,
LINDSAY ELIZABETH, and HEATHER
HENDER, individually and on behalf of
others similarly situated,

Plaintiffs,

v.

NIKE, INC., an Oregon Corporation,

Defendant.

Case No.: 3:18-cv-01477-JR

**PARTIES' JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
REVISED BRIEFING DEADLINES
FOR PLAINTIFFS' MOTION TO RULE
AS INADMISSIBLE PARTS OF THE
EXPERT REPORT OF ALI SAAD,
PH.D.**

Plaintiffs Kelly Cahill, *et al.* (“Plaintiffs”) and Nike, Inc. (“Nike” or “Defendant”) (collectively, the “Parties”), through their respective counsel, hereby present the following stipulated and agreed-upon revised briefing deadlines regarding Plaintiffs’ Motion to Rule as Inadmissible Parts of the Expert Report of Ali Saad, Ph.D. (Doc. No. 221) and request that the Court enter an order regarding the same. The Parties have a good faith basis for submitting this request, which extends their respective opposition and reply brief deadlines by one week each to account for the complexity of the motion and unanticipated scheduling conflicts. This request is not brought for purposes of delay and will not result in any prejudice to the Parties or to the Court.

STIPULATED REVISED BRIEFING DEADLINES REGRADING

PLAINTIFFS’ MOTION (DOC. NO. 221)

The Parties hereby stipulate, agree and request the Court order the following revised briefing deadlines regarding Plaintiffs’ Motion to Rule as Inadmissible Parts of the Expert Report of Ali Saad, Ph.D. (Doc. No. 221) (the prior dates are provided in the first column for ease of reference):

Litigation Deadline	Previous Deadline	Proposed New Deadline
Nike’s Opposition to Plaintiffs’ Motion	05/09/2022	05/16/2022
Plaintiffs’ Reply to the Motion	05/23/2022	06/06/2022

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD

Dated: May 9, 2022

/s/ Barry Goldstein

Laura L. Ho (admitted *pro hac vice*)
Barry Goldstein, Of Counsel (admitted *pro hac vice*)
James Kan (admitted *pro hac vice*)
Byron Goldstein (admitted *pro hac vice*)
Katharine L. Fisher (admitted *pro hac vice*)
Mengfei Sun (admitted *pro hac vice*)

GOLDSTEIN, BORGAN, DARDARIAN & HO
155 Grand Avenue, Suite 900
Oakland, CA 94612
Telephone: (510) 763-9800 | Fax: (510) 835-1417

Laura Salerno Owens, OSB #076230
David B. Markowitz, OSB #742046
Harry B. Wilson, OSB #077214
Kathryn P. Roberts OSB #064854
MARKOWITZ HERBOLD PC
1455 SW Broadway, Suite 1900
Portland, OR 97201
Telephone: (503) 295-3085
Fax: (503) 323-9105

Craig Ackerman (admitted *pro hac vice*)
cja@ackermanntilajef.com
ACKERMANN & TILAJEF PC
1180 S Beverly Drive, Suite 610
Los Angeles, CA 90035
Tel: (310) 277-0614
Fax: (310) 277-0635

India Lin Bodien (admitted *pro hac vice*)
india@indialinbodienlaw.com
INDIA LIN BODIEN LAW
2522 North Proctor Street, #387
Tacoma, WA 98406-5338
Tel: (253) 503-1672
Fax: (253) 276-0081

Attorneys for Plaintiffs, Opt-In Plaintiffs, and the
Putative Class

Dated: May 9, 2022

/s/ Felicia A. Davis

Daniel Prince, Cal. SB# 237112 (pro hac vice)
danielprince@paulhastings.com
Felicia A. Davis, Cal. SB# 266523 (pro hac vice)
feliciadavis@paulhastings.com
Laura E. Zabele, Cal. SB# 330847 (pro hac vice)
laurazabele@paulhastings.com
PAUL HASTINGS LLP
515 South Flower Street, Twenty-Fifth Floor
Los Angeles, CA 90071-2228
Tel: (213) 683-6000
Fax: (213) 627-0705

Amy Joseph Pedersen, OSB No. 853958
amy.joseph.pedersen@stoel.com
STOEL RIVES LLP
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205
Tel: (503) 224-3380
Fax: (503) 220-2480
Attorneys for Defendant Nike, Inc.

SIGNATURE ATTESTATION

In accordance with Civil Local Rule 11(b)(2), I attest that concurrence in the filing of this document has been obtained from the signatories on this e-filed document.

Dated: May 9, 2022

Respectfully submitted,

PAUL HASTINGS LLP

/s/ Felicia A. Davis
Felicia A. Davis (*pro hac vice*)

[PROPOSED] ORDER

The Court has reviewed the Parties' Joint Stipulation Regarding Revised Briefing Deadlines for Plaintiffs' Motion to Rule as Inadmissible Parts of the Expert Report of Ali Saad, Ph.D. and hereby enters the same as reflected below.

Litigation Deadline	Previous Deadline	Proposed New Deadline
Nike's Opposition to Plaintiffs' Motion	05/09/2022	05/16/2022
Plaintiffs' Reply to the Motion	05/23/2022	06/06/2022

IT IS SO ORDERED.

Dated:

HON. JOLIE A. RUSSO
United States Magistrate Judge